

1 The Honorable Benjamin H. Settle
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

8 UNITED STATES OF AMERICA,

NO. 3:20-cv-06152-BHS

9 Plaintiff,

10 v.
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13 CONSENT DECREE AND FINAL
14 Plaintiff, United States of America (“Plaintiff”), commenced the above-captioned action in
15 this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Ann Lyse, is
16 committing or about to commit a banking law violation as defined in 18 U.S.C. § 3322(d),
17 including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B).
18 Plaintiff and Defendant, *pro se*, wish to resolve Plaintiff’s allegations without litigation and
19 jointly request and consent to the entry of this Consent Decree and Final Judgment (“Consent
20 Decree”) without Defendant’s admission of liability or wrongdoing. Defendant agrees to waive
21 service of the Summons and the Complaint.
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Defendant.

CONSENT DECREE AND FINAL JUDGMENT

Plaintiff, United States of America (“Plaintiff”), commenced the above-captioned action in this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Ann Lyse, is committing or about to commit a banking law violation as defined in 18 U.S.C. § 3322(d), including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B).

Plaintiff and Defendant, *pro se*, wish to resolve Plaintiff’s allegations without litigation and jointly request and consent to the entry of this Consent Decree and Final Judgment (“Consent Decree”) without Defendant’s admission of liability or wrongdoing. Defendant agrees to waive service of the Summons and the Complaint.

1 Defendant has entered into this Consent Decree freely and without coercion. Defendant
2 further acknowledges that she has read the provisions of this Consent Decree, understands them,
3 and is prepared to abide by them.

4 **IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:**

5 1. This Court has jurisdiction over this matter and the parties pursuant to
6 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under
7 28 U.S.C. § 1391(b) and (c).

8 2. Defendant neither admits nor denies the allegations in the Complaint. Only for
9 purposes of this action, Defendant admits the facts necessary to establish jurisdiction.

10 3. For purposes of this Consent Decree:

11 a. “Defendant” means Ann Lyse.

12 b. “Person” means an individual, a corporation, a partnership, or any other
13 entity.

14 c. “Funds” include any currency, check, money order, stored value card,
15 stored value card numbers, bank wire transmission, or other monetary value.

16 d. “Money transmitting business” refers to a person who, for a fee, receives
17 funds from one person for the purpose of transmitting the funds, or providing access to the
18 funds, to another person.

19 e. “Fee” refers to a payment or compensation of any kind regardless of how
20 the payment or compensation is labeled, including but not limited to processing fees,
21 service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and
22 gratuities.

1 4. Upon entry of this Decree, Defendant is permanently prohibited and enjoined
2 from, directly or indirectly, assisting, facilitating, or participating in any money transmitting
3 business.

4 5. Within five (5) days after entry of this Consent Decree, the Defendant is ordered
5 to submit to Postal Inspector Amy Kerkof a written acknowledgement of receipt of this Consent
6 Decree sworn under penalty of perjury. The statement shall be addressed to:

7 U.S. Postal Inspector Amy Kerkof
8 U.S. Postal Inspection Service
9 P.O. Box 400
10 Seattle, WA 98111
11 206-442-6132 (desk)

12 6. The Consent Decree shall not be modified except in writing by Plaintiff and the
13 Defendant and approved by the Court.

14 7. This Consent Decree shall constitute a final judgment and order in this action.

15 8. This Court retains jurisdiction of this action for the purpose of enforcing or
16 modifying this Consent Decree and for the purpose of granting such additional relief as may be
17 necessary or appropriate.

18 **DONE AND ORDERED** in Chambers at Tacoma, Washington, this 14th day of
19 January, 2021.

1 **APPROVED AND ENTERED BY THIS COURT**

2 Dated this 14th day of January 2021.

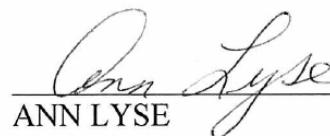
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4 _____
5 BENJAMIN H. SETTLE

6 United States District Judge
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8 We hereby consent to the entry of the foregoing Decree:
9

10 **FOR DEFENDANT ANN LYSE**

11 Dated: Oct. 30, 2020

12 
13 _____
14 ANN LYSE

15 **FOR PLAINTIFF THE UNITED STATES OF
16 AMERICA**

17 BRIAN MORAN
18 United States Attorney

19 Dated: November 24, 2020

20 By: s/Nickolas Bohl
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